REMARKS

**Summary of the Office Action:** 

In the present application, claims 1-28 are pending and stand rejected.

Claim objections

Claims 27 and 28 were objected to due to informalities. Claims 27 and 28 have

been modified to cure such informalities. Claims 27 and 28 have not been modified to

overcome any references and such claim modifications should not be assumed to have

been made overcome any references.

Claim rejections under 35 U.S.C. §103

Chun in view of Lynch

Claims 1-28 were rejected under 35 U.S.C. §103 as being anticipated by Chun et

al. U.S. Patent No. 5,892,693 (hereinafter Chun) in view of Lynch et al. U.S. Patent No.

5,892,849 (hereinafter Lynch). In response, Applicant respectfully asserts that claims 1-

28 are patentable over *Chun* in view of *Lynch*.

Claims 1, 14 and 27 recite, in part, receiving a selection of a center of motion

for an assembly of computer aided design (CAD) models of a mechanical design. In

turn, the Examiner cites column 5, lines 18-25 of Chun as teaching receiving a selection

of a center of motion for an assembly of CAD models of a mechanical design. Applicant

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respectfully disagrees. As disclosed in lines 19-22, the *Chun* disclosure is directed to judging *unit regions* (e.g. a plurality of divisions of a frame separated along X and Y axes, see *Chun* column 2 lines 16-21). This "judgement" is performed by moving a grid region with respect to an object to find a grid region location that provides for the object residing in the minimum number of unit regions. Further, lines 22-25 describe estimating the motion of an object using the above described "judged unit region" and detecting the position of the grid using the information of the object. There is no discussion of a center of motion. Thus, *Chun* cannot be said to teach receiving a selection of a center of motion for an assembly of CAD models of a mechanical design. *Chun*, as discussed above with respect to the cited section, simply does not address the issue of the center of motion for an assembly of CAD models. Further, Applicant respectfully submits that *Chun* does not discuss at any point in the disclosure the center of motion of an assembly CAD model of a mechanical design.

In further support of the 103 rejection, the Examiner cites *Lynch* as teaching the selection of components. This citation of *Lynch* is to overcome *Chun*'s failure to clearly and specifically disclose receiving a selection of a component of the assembly associated. Assuming, arguendo, that *Lynch* so teaches, *Lynch* nonetheless does not cure the deficiencies of *Chun*. Specifically, *Lynch* does not disclosure or suggest receiving a selection of a center of motion for an assembly of computer aided design (CAD) models of a mechanical design. Thus, *Lynch* does not cure the deficiency of *Chun* as discussed above. Thus, for at least the reasons set forth above, claims 1, 14 and 27 are patentable over *Chun* in view of *Lynch*.

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Attorney's Docket No.: 109869-130068 Application No.: 09/843,321 Claims 2-10 and 15-23 depend from claims 1 and 14 respectively. Thus, for at least the reasons discussed above with respect to claims 1 and 14, Applicant respectfully submits that claims 2-10 and 15-23 are patentable over *Chun* in view of *Lynch*.

Claims 1, 11, 14, 24, 27 and 28 recite, in part, **determining a range of motion for a component**. The Examiner does not assert that such a limitation is present in either *Chun* or *Lynch*. Further, upon review of both references, Applicant respectfully submits that neither reference discloses **determining a range of motion for a component**. The prior art reference (or references when combined) must teach or suggest **all of the claim limitations** (See MPEP §706.02(j)). Therefore, Applicant respectfully asserts that claims 1, 11, 14, 24, 27 and 28 are patentable over *Chun* in view of *Lynch*.

Claims 2-10, 12-13, 15-23 and 25-26 depend from claims 1, 11, 14 and 24 respectively. Thus, for at least the reasons discussed above with respect to claims 1, 11, 14 and 24, Applicant respectfully submits that claims 2-10, 12-13, 15-23 and 25-26 are patentable over *Chun* in view of *Lynch*.

## **Conclusion:**

In view of the foregoing, claims 1-28 are in condition of allowance. Early issuance of Notice of Allowance is respectfully requested. The Examiner is encouraged to telephone the undersigned if there are any remaining questions of patentability, and a

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telephone interview would be helpful in resolving these questions. The Examiner is authorized to charge any shortages and credit any overages to our Deposit Account Number 500393.

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